

**RESELLER PROTESTS AGAINST AIRTOUCH ADVICE LETTER FILINGS**  
June 1990 - September 1994

<u>Date AL Filed</u>	<u>Market</u>	<u>AL Subject</u>	<u>Protestant</u>	<u>Protest Subject</u>	<u>Disposition</u>
08/10/90	Los Angeles	Establish Temporary Tariff Authority	Cellular Dynamics	Cost Data	Resolution in favor of LASLP 11/9/90.
08/10/90	Los Angeles	Establish Temporary Tariff Authority	CRA	Cost Data	Resolution in favor of LASLP 11/9/90.
08/11/90	Los Angeles	Introduce Welcome Back Program	Cellular Dynamics	Improper Rates	CACD staff "ignores" protest.
11/06/90	San Diego	Introduce Airtime Promotion	CRA	Bundling Equipment and Service and Disclosure of Resellers customer information	CACD staff dismisses protest.
11/12/90	Sacramento	Introduce Promotional Events Rule	CRA	Allows waiver of tariff charges in violation of PUC rates	Staff dismisses.
03/26/91	San Diego	Change the calculation of service establishment and change charges	CRA	Reduced Wholesale Margin	Supplemental AL 56-A filed. 6/28 Effective.
11/13/91	Los Angeles	Modify terms for reactivation and Temporary Deactivation	CRA	Discriminatory, Anti-Competitive, Margins	Protest dismissed.
12/03/91	Los Angeles	Make minor type corrections to AL 121	CRA	Discriminatory, Anti-Competitive, Margins	Protest dismissed.
12/03/91	Los Angeles	Loaner Phone	CRA	Discrimination/Bundling	Withdrawn; eff. 4/13/92 w/AL 122-A.
04/13/92	San Francisco	Phone Rental	CRA	Temporary Tariffing Process and Bundling	**Became effective after 6 months.
09/02/92 (T)	Los Angeles	Basic and Corp Plus Plans	CRA	Rates/Margins	CACD accepts response; eff. 10/30/92 w/AL 160-A.

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\* - Protested, Commission resolution pending

\*\* - Protested AL permanently effective after 6 months of inaction by CPUC

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10/30/92	Los Angeles	Supplement w/Compromise	CRA	Sufficient Documentation for Resellers	Dismissed as untimely.
09/02/92 (T)	Los Angeles	Premium Plus v. Basic Plus Margin	CRA	Rates/Margins	CACD accepts response; eff. 10/30/92 w/AL 160-A.
10/13/92 (T)	Los Angeles	Airtime Credit Promotion	CRA	Sufficient Documentation for Resellers	Dismissed 11/30/92; CACD to issue policy guidelines; eff. 11/16/92.
11/03/92	San Diego	Introduce Flex Annual and Biennial Plans	CRA	Sufficient Documentation for Resellers	Dismissed; CACD to issue policy guidelines; eff. 12/4/92 w/AL 115-B. 1/15/93 Effective.
02/12/93 (T)	Los Angeles	No Charge Call Rules	CRA	Anti-Competitive Discriminatory	CACD dismissed protest 3/17/93; eff. date 2/16/93(SIC); 30 day eff. date 3/16/93.
02/16/93	San Diego	Introduce Easy Pay Plan	CRA	Reduced margins, unreasonable documentation required, and must install own data communication links	Protest Withdrawn 7/19/93. Supplemental AL 125-C filed 7/19/93 with changes to Wholesale Easy Pay Billing. 9/1/93 effective.
05/27/93	Los Angeles	Automatic Renewal	CRA	Discriminatory, Withdrawal of Service	Withdraw protest (via letter 12/3/93) on condition Supplemental AL filed. Suppl. AL filed 12/6/93.
06/04/93	Los Angeles	Corporate/Volume Purchaser Contract Plan	CRA	Margins	Supplemental AL 229-A filed 7/2/93.

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06/07/93 (T)	Los Angeles	Corporate/Volume Purchaser Contract Plan and Ultra Value Plans	CRA	Margins	**Became effective filings under Temporary Authority are permanently effective after 6 months if no action by CPUC. 12/7/93 Effective.
06/21/93	San Diego	Introduce Flex Annual Plans	CRA	Reduced Margin	Protest Withdrawn 7/19/93. Supplemental AL 133-A filed 7/19/93 with reduced wholesale single tier rates. 7/21/93 effective.
07/23/93	Los Angeles	Corporate/Volume Purchaser Contract Plan, Ultra Plans and Gov't Plan	CRA	Early Termination Fees	*Protest: Early Termination Penalty for Optional Feature Package. Response: Defended AL and Market Practice.
08/04/93	Los Angeles	Corporate/Volume Purchaser Contract Plan, Ultra Plans and Gov't Plan	CRA	Early Termination Fees	*Protest: Early Termination Penalty for Optional Feature Package. Response: Defended AL and Market Practice.
10/07/93	Los Angeles	Clarification of how Free Off- Peak Airtime Subscribers can change service plans	CRA	Sufficient Documentation	*Protest: "Sufficient Documentation" Clause. Response: Defended Operational Requirement.
11/05/93 (T)	Los Angeles	\$100 Credit Promotion	CRA	Sufficient Documentation	**Protest: "Sufficient Documentation" Clause. Response: Defended Operation Requirement. 5/5/94 Effective.

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12/14/93	San Diego	Introduce End-User Billing option	CRA	Violates Volume User Requirements and Reduced Margin	CACD granted, 159-A filed 4/4/94. Clarifies wholesale charges.
01/13/94 (T)	Los Angeles	Include Corporate Volume Purchaser Contract Plan Subscribers in current \$100 Credit Promotion and introduce a Service Est Credit Promotion	CRA	Sufficient Documentation, Margins	**Protest: "Sufficient Documentation" Clause and Margin Maintenance. Response: Defended Operational Requirement and Adjusted Rates. 2/11/94 filed 297-A; permanently effective 7/13/94.
04/06/94 (T)	Los Angeles	Allow Corporate/Volume Purchaser Contract Plan Subscribers to aggregate MIN/ESNs from selected plans for rate reductions	CRA	Plan Design Compatibility w/D.90-06-025	**Protest: Margin Maintenance and Promotional Plan Terms. Response: Defended Operational Requirement and Defended Rates and Margins.
06/06/94	San Diego	Modify tariffs in accordance w/ACR D.94-04-043	CRA	Must pro-rate early termination charge	Supplemental AL filed 7/14/94 in response to protest.
06/07/94	Los Angeles	Modify tariffs in accordance w/ACR D.94-04-043	CRA	Must pro-rate early termination charge	Supplemental AL filed 7/14/94 in response to protest.
06/15/94 (T)	Los Angeles	Modify deposit condition and eliminate certain wholesale change charges	CRA	Real Time Access to Call Records	*Still waiting for resolution. Protest: Less Advantageous Terms for Resellers. Response: Defended AL and Market Practice and Defended Operational Requirement.

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06/22/94 (T)	Los Angeles	Introduce a promotion for retail and wholesale subscribers to one of Company's Corporate/Volume Purchaser contract Plans	CRA	Anti-Competitive	*Still waiting for resolution. Protest: Promotional Plan Terms. Response: Defended AL and Market Practice.

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CERTIFICATE OF SERVICE

I, David A. Gross, do hereby certify that I have on this 19th day of September, 1994, caused to be forwarded a copy of the foregoing APPENDICES TO OPPOSITION OF AIRTOUCH COMMUNICATIONS TO CPUC PETITION TO RATE REGULATE CALIFORNIA CELLULAR CARRIERS by first class United States mail, postage prepaid, to the following:

Peter Arth, Jr.  
Edward W. O'Neill  
Ellen S. Levine  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

  
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David A. Gross